

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

CONSERVATION LAW FOUNDATION,
INC.,

Plaintiff,

v.

SCHNITZER STEEL INDUSTRIES, INC.
AND SCHNITZER PUERTO RICO, INC.,

Defendants.

CIVIL NO. 3:22-cv-01087-ADC

JOINT MOTION FOR EXTENSION OF
TIME TO FILE ANSWER

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Pursuant to Local Rule 6 and Fed. R. Civ. P. 6(b), Plaintiff Conservation Law Foundation (“CLF”) and Defendants Schnitzer Steel Industries, Inc. and Schnitzer Puerto Rico, Inc. (collectively, “Defendants”) respectfully submit this Joint Motion for a 60-day extension of the deadline for Defendants to file their answer to the complaint. The deadline for Defendants to file the answer is currently September 19, 2022. If granted by the Court, this motion would reset the deadline for Defendants to file their answer to November 18, 2022. If the Court denies this motion, the parties request that the due date for the answer be set at seven (7) days from the date of the Court’s denial.

The parties have good cause for seeking an extension of time for filing the answer under Local Rule 6 and Fed. R. Civ. P. 6(b), as the parties have been diligently negotiating to settle all issues in this case and have exchanged several drafts of a proposed consent decree toward that end. The parties are optimistic that, with the extension time of time requested, they will be able to lodge a proposed consent decree with the Court in the near future.

September 14, 2022

Respectfully submitted,

CONSERVATION LAW FOUNDATION,
INC.

SCHNITZER STEEL INDUSTRIES, INC.
SCHNITZER PUERTO RICO, INC.

By its attorneys:

By its counsel:

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CERTIFICATE OF SERVICE

I hereby certify that, on this same date, a true and exact copy of this notice was filed through the ECF system, by which means a copy of the filing will be sent electronically to all parties registered with the ECF system.

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